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12   **UNITED STATES DISTRICT COURT**

13   **DISTRICT OF NEVADA**

14 CHRISTINE COSIO,

15   Plaintiff,   Case No. 2:17-cv-01940-JAD-PAL

16   vs.

17 STATE OF NEVADA ex rel. NEVADA   **MOTION TO EXTEND DEADLINE**
   DEPARTMENT OF TRANSPORTATION,   **FOR DISPOSITIVE MOTIONS**
18 a political subdivision of the State of Nevada;
   DOES I through V, inclusive; and ROES   **(FIRST REQUEST TO EXTEND**
19 corporations I through V, inclusive,   **DEADLINE FOR DISPOSITIVE**
                                            MOTIONS, SECOND REQUEST TO
20   Defendants.   **EXTEND DEADLINES IN**
                                            STIPULATED DISCOVERY PLAN
21   **AND SCHEDULING ORDER)**

22

23   Defendant, STATE OF NEVADA ex rel. NEVADA DEPARTMENT OF

24 TRANSPORTATION ("NDOT"), by and through its legal counsel, ADAM PAUL LAXALT,

25 Attorney General, DOMINIKA J. BATTEN, Deputy Attorney General, and KEVIN A. PICK,

26 Deputy Attorney General, hereby submit this Motion to Extend the May 7, 2018, Deadline for

27 Dispositive Motions, pursuant to Local Rules IA 6-1, IA 6-2, and 26-4.

28 * * *

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This is the Defendant's first request to extend the deadline for dispositive motions and the second request to extend deadlines set forth in the Stipulated Discovery Plan and Scheduling Order, the first such request having been by stipulation between the parties. *See* ECF No. 21.

On October 10, 2017, this Court entered an Order granting the Discovery Plan and Scheduling Order submitted by the parties. *See* ECF No. 12. The parties then filed a stipulated request to amend the Court's Scheduling Order and specifically requested a sixty (60) day extension to the discovery deadline. *See* ECF No. 20. The stipulated extension of the discovery deadline was granted by the Court and the deadline for dispositive motions was necessarily extended as well.

The Defendant now requests a **three (3) week extension** of the deadline for dispositive motions, which is currently set to expire on May 7, 2018. Good cause exists to grant this requested extension due a death in the immediately family of Deputy Attorney General, Dominika J. Batten, who is the primary/handling attorney assigned to this case. This request for an extension of time is made in good faith, and not for the purpose of undue delay. If granted, the new deadline for dispositive motions would be May 29, 2018 (May 28, 2018, is a Federal holiday). Based on the foregoing, the Defendant respectfully requests that the deadline for dispositive motions be extended an additional three (3) weeks.

DATED: April 26, 2018

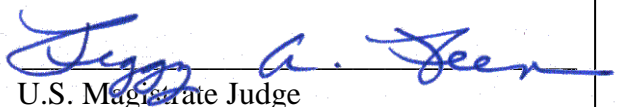ADAM PAUL LAXALT
Attorney General

By: */s/ Kevin A. Pick*
    KEVIN A. PICK, ESQ.
    Deputy Attorney General
    Nevada Bar No. 11683
    Attorneys for Defendants

ORDER

IT IS SO ORDERED.

Dated: _____ May 8 _, 2018

_____
U.S. Magistrate Judge

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), the undersigned hereby certifies that she is an employee of the State of Nevada Office of the Attorney General and is a person of such age and discretion as to be competent to serve papers. That on this date, the undersigned filed a true and accurate copy of the foregoing **MOTION TO EXTEND DEADLINE FOR DISPOSITIVE MOTIONS** with the United States District Court, using the CM/ECF Electronic Filing, which will e-serve the following parties electronically:

Andrew L. Rempfer
10091 Park Run Drive, Suite 200
Las Vegas, NV 89145-8868
Andrew@rmllegal.com
Attorney for Plaintiff

Dated this 26th day of April, 2018.

/s/ *Ginny Brownell*
Ginny Brownell, an employee of
the office of the Nevada Attorney General

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